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Thursday, November 17, 2022

***Via ECF***

Honorable James B. Clark, III, U.S.M.J.  
UNITED STATES DISTRICT COURT  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

RE: *Alejandro Morales v. Healthcare Revenue Recovery Group, LLC, et al.*,  
Case No. 2:15-cv-08401-EP-JBC

Dear Judge Clark,

My office represents Plaintiff Alejandro Morales.

I am in receipt of the letter [ECF No. 186] from Defendant's counsel, Jonathan R. Stuckel, Esq., requesting an extension of time on the parties' briefing schedule.

Plaintiff is prepared to serve his Response to Defendant's summary judgment motion by the existing November 24, 2022 deadline. I would have appreciated the courtesy of counsel discussing his proposed modifications before submitting his request to the Court—at least to ensure that his proposed new deadlines did not conflict with our schedule. I note that, in another action pending in this District involving the same Defendant and the same firm representing Defendant, I sought their consent to an extension and was given a hard time (but, after too much back-and-forth, defense counsel consented).

While Plaintiff's consent has not been requested, Plaintiff does not object to Defendant's request because there is no foreseeable prejudice to Plaintiff from the requested two-week extension. But, if denied, Plaintiff will serve his response in accordance with the existing schedule.

Thank you for Your Honor's consideration in this matter.

Respectfully,  
*s/Philip D. Stern*  
Philip D. Stern  
KIM LAW FIRM LLC

cc: All Counsel of Record